

EXHIBIT I.4

1 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
2 EASTERN DIVISION
3 IN RE: NATIONAL) MDL No. 2804
PRESCRIPTION OPIATE)
4 LITIGATION) Case No.
1:17-MD-2804
5)
THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
6 ALL CASES)
)

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8
9
10 Friday, January 25, 2019
11

12 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW
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15
16 Videotaped Deposition of EUGENE G.
CAVACINI, held at Winstead PC, 2728 North
17 Harwood, Suite 500, Dallas, Texas, commencing
at 9:01 a.m., on the above date, before
18 Michael E. Miller, Fellow of the Academy of
Professional Reporters, Registered Diplomate
19 Reporter, Certified Realtime Reporter and
Notary Public.
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22

23
24 GOLKOW LITIGATION SERVICES
877.370.3377 ph | fax 917.591.5672
25 deps@golkow.com

1 our hands as far as people dying out there
2 from this epidemic?

3 MS. HENN: Objection --

4 BY MR. BOGLE:

5 Q. So maybe we're going to sell
6 less of this stuff?

7 MS. HENN: Objection to form,
8 lacks foundation.

9 BY MR. BOGLE:

10 Q. Are you aware of any discussion
11 along those lines?

12 MS. HENN: Same objections.

13 A. I'm not aware of any
14 discussions of where we have had discussions
15 around caps or limiting these products and
16 believe that those decisions should be made
17 between a medical professional and a patient.

18 BY MR. BOGLE:

19 Q. As to how much you ship?

20 A. As to how much is prescribed
21 and ultimately how much is ordered.

22 Q. Okay. But you -- McKesson --
23 when I say you, I don't mean you,
24 Mr. Cavacini. You, the McKesson Corporation,
25 can make decisions on how much of any product

1 they are willing to ship, right? That's
2 within the company's purview to decide,
3 right?

4 MS. HENN: Objection to form,
5 asked and answered.

6 A. But I think it is a balance
7 between making sure that these products are
8 available to patients who need them when they
9 need them, all the medications that we
10 provide.

11 You know, we are a distributor
12 and a logistics company that see orders from
13 pharmacies and pharmacists pursuant to
14 prescriptions. I don't think we should be
15 making clinical decisions. Under the --

16 BY MR. BOGLE:

17 Q. Well -- go ahead. Go ahead.
18 No.

19 A. Under the Controlled Substances
20 Act, we have a responsibility to make sure
21 that we have an effective program to guard
22 against controls and that we have a system to
23 alert orders that deviate in size, pattern
24 and frequency.

25 Q. Okay. And do you dispute that